

SUMMARY OF COMMENTS

This summary highlights, in capsule form, those comments made most frequently. The comments are grouped by the components of the grant life-cycle and supporting processes, systems, and standards. This summary does not include the detailed indications of the reasons for raising an issue.

ANNOUNCEMENT OF FUNDING OPPORTUNITIES
Improve accessibility and availability of information about funding opportunities and of application forms/formats
Include complete contact information (name, telephone number, e-mail-address)
Display <i>Catalog of Federal Domestic Assistance</i> (CFDA) number in all announcements
Use clear language in announcements and make contents more consistent in coverage and placement of information
Clearly specify the eligibility of Native American tribes/tribal organizations
Allow adequate time for application preparation and submission
Specify (and adhere to) time frame for making funding decisions
Specify whether cost sharing will be an evaluation factor
Stagger proposal submission, renewal, and reporting dates

APPLICATIONS
Use a standard application form/format/data elements for programs with common purposes
Ensure requirements are common in programs for like purposes (e.g., research) and include only those requirements potentially applicable to the activity
Improve and streamline the SF-424/424A, including eliminating duplicate questions
Examine data elements apart from their prior inclusion on paper forms to justify need
Require agencies to justify changes/additions to the standard forms/format/data elements
Eliminate need to provide the same organizational and professional profile information in each application—Federal agencies should require only updates
Reduce information requirements in or eliminate continuation applications
Create standard for amount of budget justification/backup required
Develop a single set of consistent, correct application instructions
Do not require detailed information, such as some of the budget information, in all applications as part of the initial submission—only for those projects are selected for funding
Maintain an inventory of required certifications and assurances (after streamlining)
Allow an annual (or multi-year) organizational certification for applicable assurances rather than multiple submissions within the same year (to the same Federal program or multiple Federal programs)—independent of submission of individual applications/awards
Establish a standard format for required certifications and assurances, requiring only a single signature, and allow electronic submission
Tailor requirements to type of activity/organization rather than boilerplate assurances

APPLICATIONS (Continued)
Eliminate requirements for hard-copy filing of signatures when filing electronically (same comments applies to reports and payment requests)
Increase use of pre-applications to reduce effort and resources spent on preparing applications that may have limited chance of success
Allow electronic application, including completion on line (not simply pdf formats)
Provide online capability to determine application status
Allow single, government-wide point for submission of applications
Limit number of copies required

AWARDS
Use a standard format/data elements for award notification
List applicable requirements in awards or provide reference to up-to-date Web site
Show the CFDA number on all award notices
Ensure awards include internally consistent requirements
Reduce time between application submission and funding—an extended period for agency action with the possibility of awards being made after the requested start date and/or for a shortened period affects the ability to plan and may have a negative impact on performance
Provide timely notification of denial and offer feedback on reasons
Provide electronic notification of awards (e-mail or Web posting)
Reduce time between application submission and funding

REPORTING
Allow electronic completion and filing of the SF-269 (Financial Status Report)
Eliminate requirements for hard-copy filing of signatures when filing electronically
Adopt a single, standard financial reporting form
Change due date for the final SF-269 from 90 days to 120 days to allow for completion of report after liquidation of obligations (90 days)
Simplify the SF-269
Require use of either the SF-269 or the SF-272 (Federal Cash Transactions Report), not both
Allow reporting basis to be consistent with grantee's established accounting system
Eliminate requirements for cash forecasts
Consolidate and standardize invention reporting requirements
Do not require recipients to submit the same report to multiple locations
Include information required in separate reports in continuation applications
Reduce variations in reporting periods for similar reports (currently quarterly to annually) and make more consistent with required submission of performance reports
Make all required forms available on the Web

PAYMENT
Continue efforts to consolidate and streamline payment systems to alleviate burdens associated with training staff and maintaining multiple interfaces
Require agencies to conform to the choice of CFO-approved payment systems and not add unique requirements that would require reprogramming of recipient systems
Make pooled payments the standard—systems that require draw downs at the project level are burdensome
Have different systems that require submission of the same form, e.,g. the SF-272, use a common form of submission (electronic or paper), with the instructions and the same look
Designate knowledgeable focal points to assist with problems, particularly “troubleshooters” with system knowledge
Provide training and timely feedback
Reduce use of cash requests (reimbursement using paper forms) and level of required supporting documentation
Allow electronic updating of SF-272 (Federal Cash Transactions Report) from recipient files
Include names of Federal disbursing agency and intended recipient agency on wire transfers as well as invoice number
Do not require programmatic information as part of payment request
Provide means of determining status of payment requests and other financial information (e.g., Federal disbursement information)

TERMS and CONDITIONS AND GENERAL ADMINISTRATIVE REQUIREMENTS
Standardize terms and conditions by type of organization/activity, eliminate agency re-issuance and interpretation through their own rules and policies, and make agencies justify unique requirements
Make presentation of terms and conditions consistent and applicability and meaning clear
Allow greater flexibility in changing budget categories
Improve consistency between Federal grant administration circulars or consolidate them
Make non-expendable personal property definitions and requirements consistent across Federal agencies and programs
Be consistent in addressing what is considered allowable as cost sharing, including allowability of unrecovered indirect costs for cost sharing
Clarify invention reporting and intellectual property rights
Allow for electronic submission of budget revision requests
Allow full implementation of expanded authorities (authorities agencies can, but are not required to, provide to recipients under research grants under OMB Circular A-110) across all applicable awards
Modify OMB Circular A-110 to allow electronic storage of records as the standard
Recognize need for lesser requirements on “small” grants and on subgrants
Standardize policies on program income
Establish consistent prior approval requirements and maintain a matrix of the resulting requirements
Clarify A-110 on property requirements, particularly for exempt property

TERMS and CONDITIONS AND GENERAL ADMINISTRATIVE REQUIREMENTS (Continued)
Establish common format and requirements for streamlined grant closeout
Develop consistent policy on carryover of funds
There should be a periodic review of terms and conditions to ensure need, propriety, currency
Establish a consistent approach to environmental assessment requirements across agencies
Consistently apply human subjects requirements
Create uniform equal employment opportunity and civil rights requirements

COST PRINCIPLES
Eliminate inconsistent allocation methods and restrictions on/differences of interpretation about indirect cost recoveries
Change requirements for documentation of staff time spent on multiple Federal programs (there should be a threshold amount)
Improve consistency among the Federal cost principle circulars or consolidate them
Avoid introducing new restrictions for sake of consistency
Reduce burdens associated with time and effort reporting
Recognize the permissive areas of A-21 (for example, interrelated projects) and do not require extensive documentation in advance

AUDIT
Issue additional guidelines, in plain language, that address monitoring of subrecipients, including status of for-profits, and ensuring subrecipients meet audit requirements
Provide better information on roles and responsibilities, status of audits
Develop document summarizing the single audit process and highlighting important aspects
Provide clearer language in award documents and increase communication with recipients about audit requirements
Enhance the SF-SAC to include more and different data, including sufficient information to determine whether subrecipients' findings related to a recipient's award
Ensure that Federal agencies obtain required information from the Federal Audit Clearinghouse (FAC) database rather than requesting reports directly from recipients
Educate recipients on availability and use of the FAC
Clarify that recipients can go directly to FAC to review subrecipient audits
Streamline FAC procedures
Ensure that Federal agencies comply with OMB Circular A-133—they continue to conduct "special audits" apart from the single audit without proper coordination
Review the single audit process as it relates to subrecipients—currently it is not adequate to ensure subrecipients are spending Federal funds appropriately and creates a recipient responsibility that extends beyond its individual award(s) to a subrecipient

ELECTRONIC PROCESSING
Work toward standardization in areas such as single point of entry for applications, and security
Continue development of Federal Commons
Maintain focus on standard transactions sets and data dictionary
Involve users in design and testing of automated systems they will be required to use
Provide full automation capability that covers the entire grant life cycle, including ability to check status of applications
Ensure Federal staff are trained in system requirements and can provide timely and useful technical assistance
Provide training manuals and technical assistance to recipients

OTHER
Maximize use of the Web to include up-to-date information—contacts, frequently asked questions, notification of changes in requirements, checklists, examples of successful applications
Make up-to-date contact information available on the Web and post it in a standardized manner
Have a means to address agency responsiveness
Improve communications between Federal headquarters and field offices and among affected constituencies within agencies (program staff, awarding office staff, financial management staff, auditors, information technology staff)
Increase use of block grants to States
Enhance customer service
Need training of Federal and non-Federal staff in revised processes/requirements
Extend simplification and streamlining efforts based on type of activity/organization rather than solely on the basis of award instrument—keep open possibility of extension to certain contracts
Need to be able to ensure consistent interpretation of requirements, not just consistent requirements
Make appropriate use of award instruments consistent with the purposes of those instruments as provided in the Federal Grant and Cooperative Agreement Act